

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:

John Edward McKnight, III

Debtor(s).

CHAPTER 13

CASE NO.: 22-13410-amc

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC d/b/a Shellpoint Mortgage Servicing (“NewRez”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esquire
Hill Wallack LLP
1415 Route 70 East, Suite 309
Cherry Hill, NJ 08034
Telephone: (856) 616-8086
Facsimile: (856) 616-8081
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PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NewRez’s (i) right to have final orders in non-core matters entered only after de novo review by

a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: September 19, 2023

Hill Wallack LLP

By: /s/ Angela C. Pattison
Angela C. Pattison, Esq.
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Counsel to NewRez LLC d/b/a Shellpoint Mortgage
Servicing

**UNITED STATES BANKRUPTCY COURT
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(Philadelphia)**

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance of NewRez LLC d/b/a Shellpoint Mortgage Servicing in the manner indicated below on September 19, 2023:

John Edward McKnight, III
40 N Bonsall Ave.
Glenolden, PA 19036

Debtor

Via Regular Mail

MICHAEL A. CATALDO
Gellert, Scali, Busenkell & Brown LLC
1628 JFK Blvd
Suite 1901
Philadelphia, PA 19102

Counsel for Debtor

Via ECF

Office of the U.S. Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107
**United States Trustee
Via ECF**

SCOTT F. WATERMAN
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
**Chapter 13 Trustee
Via ECF**

By: /s/ Angela C. Pattison
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